

RESPONSE OF OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO OFFICIAL COMMITTEE OF TORT  
CLAIMANTS' MOTION FOR REIMBURSEMENT OF MEMBER EXPENSES (DKT. NO. 813)

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of Unsecured Creditors*

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re:

**PG&E CORPORATION**

- and -

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- Affects PG&E Corporation
- Affects Pacific Gas and Electric Company
- Affects both Debtors

\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).

Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11  
(Lead Case)  
(Jointly Administered)

**RESPONSE OF OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS TO MOTION OF  
OFFICIAL COMMITTEE OF TORT  
CLAIMANTS PURSUANT TO 11 U.S.C. §§  
503(b)(3)(f) AND 105(a) TO ESTABLISH  
PROCEDURES FOR REIMBURSEMENT OF  
EXPENSES OF TORT COMMITTEE  
MEMBERS [Dkt No. 813]**

Date: April 9, 2019  
Time: 9:30 a.m. (Pacific Time)  
Place: United States Bankruptcy Court,  
Courtroom 17, 16th Floor  
450 Golden Gate Avenue,  
San Francisco, CA 94102

1                   RESPONSE OF OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO OFFICIAL COMMITTEE OF TORT  
2 CLAIMANTS' MOTION FOR REIMBURSEMENT OF MEMBER EXPENSES (Dkt. No. 813)

3                   The Official Committee of Unsecured Creditors (the "Committee") in the chapter 11 cases of  
4 the above-captioned debtors and debtors-in-possession (collectively, the "Debtors") hereby responds  
5 (this "Response") to the *Motion of Official Committee of Tort Claimants Pursuant to 11 U.S.C. §§*  
6 *503(b)(3)(F) and 105(a) to Establish Procedures for Reimbursement of Expenses of Tort Committee*  
7 *Members* (the "Reimbursement Procedures Motion") [Dkt. No. 813].<sup>1</sup>

8                   **RESPONSE**

9                   Pursuant to the Reimbursement Procedures Motion, the Official Committee of Tort Claimants  
10 (the "TCC") seeks to establish expedited expense reimbursement procedures in order to facilitate  
11 prompt payments to its Members. The Committee supports the reimbursement of reasonable and  
12 appropriate expenses for all estate fiduciaries. As such, the Committee has no objection to  
13 Reimbursement Procedures Motion, provided that its application be expanded to cover all members  
14 of both official committees so that all estate fiduciaries operate under identical procedures. Counsel  
15 for the Committee has discussed this matter with counsel for the TCC and understands that the TCC  
16 has no objection to their proposed procedures being adopted for both official committees.

17                   WHEREFORE, for the reasons set forth in the Response, the Committee respectfully requests  
18 that the Court enter an order granting the Reimbursement Procedures Motion, as modified to apply  
19 to all members of both official committees.

20  
21                   DATED: April 1, 2019

/s/ Dennis F. Dunne

Dennis F. Dunne

MILBANK LLP

*Proposed Counsel for the Official Committee  
of Unsecured Creditors*

27                   <sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in  
28 the Reimbursement Procedures Motion.